

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

DATE: OCT 27 2004

**SUBJECT: Onondaga Lake Superfund Site: Crouse-Hinds Landfill
Preliminary Site Assessment Report North & South Landfills**

**FROM: Steven Ferreira, Environmental Scientist
Environmental Review Section**

**TO: Bob Nunes, Remedial Project Manager
Central New York Remediation Section**

We have reviewed the September 2004 Preliminary Site Assessment (PSA) Report: North and South Landfills, prepared for the Crouse-Hinds Landfill, located in the Town of Salina and the City of Syracuse, Onondaga County, New York. The site is comprised of the North Landfill (21 acres) and the South Landfill (15 acres).

Our review of the above reports indicates that the following location-specific ARARs/TBCs may be applicable for this project.

- **E.O. 11988, "Floodplain Management;"**
- **E.O. 11990, "Protection of Wetlands;"**
- **40 CFR Part 6 Appendix A;**
- **EPA's 1985 "Statement of Policy on Floodplains/Wetlands Assessments for CERCLA Actions" and**
- **the National Historic Preservation Act.**

Floodplains

There is no information in the PSA to note whether the site lies within the 100-year or 500-year floodplain. However, as both the North & South Landfill are adjacent to Ley Creek, it is likely that a least a portion of the project area is within the floodplain. Consequently, we request that both floodplains be delineated within the project area. If any future remedial activities are proposed within either floodplain, a floodplain assessment will be required, to minimize or avoid the adverse effects of a 500-year event, as well as to protect against the spread of contaminants and the long-term disabling of remedial treatment systems due to flooding events. In addition to the aforementioned delineation of the 100-year and 500-year floodplain in the project area, this assessment would include:

- **a description of the proposed action;**
- **the effects of the proposed action on the floodplain;**
- **a description of the other remedial alternatives considered and their effects on the floodplain; and**
- **measures to mitigate potential harm to the floodplain if there is no practicable alternative to locating in or affecting the floodplain, including impacts to the proposed remedial action from flooding events during and after implementation of the remedy.**

In addition, if remedial actions will take place within the delineated 100-year and 500-year floodplains, a Statement of Findings will be needed to document this decision in the ROD. The Statement of Findings may be included in the ROD support document or attached as a separate appendix. It should not exceed three pages, and must include:

- **the reasons why the proposed action must be located on or affect the floodplain;**
- **a description of significant facts considered in making the decision to locate in or affect the floodplain;**
- **a statement indicating whether the proposed action conforms to applicable State or local floodplains protection standards;**

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- a description of the steps taken to design or modify the proposed act to minimize potential harm to or within the floodplain; and
- a statement indicating how the proposed action affects the natural or beneficial values of the floodplains.

Wetlands

The PSA does not contain a formal delineation of wetlands within the project area; however, the "Vegetation and Wildlife Study" included as Attachment Four of the PSA does note emergent wetlands areas along the perimeters of the North and South Landfill. If the identified wetlands will be impacted by any future remedial action, we recommend a formal field delineation of wetlands be conducted, utilizing the Army Corps three parameter methodology. This delineation should be portrayed on future site maps in relation to areas of contamination. In addition, should site wetlands be impacted by future remedial activities, a wetlands assessment will be needed. In addition to the aforementioned delineation of project area wetlands, this assessment should include:

- an assessment of wetlands values and functions;
- a characterization of site flora and fauna;
- a brief discussion of the impacts of the selected remedial alternative as compared to the other options;
- the effects of contaminants on wetlands resources;
- measures to minimize potential adverse impacts that cannot be avoided;
- replacement for wetlands losses (mitigation), and
- a post-mitigation monitoring plan.

This assessment is necessary to determine the functions and values associated with the wetlands prior to remedial impact, as well as to aid in restoring these functions and values to the greatest extent possible after the remedy is implemented.

In addition, if any future selected remedial action for this site will affect wetlands, a Statement of Findings will be needed to document this decision in the ROD. The Statement of Findings may be included in the ROD support document or attached as a separate appendix. It should not exceed three pages, and must include:

- the reasons why the proposed action must be located in or affect wetlands;
- a description of significant facts considered in making the decision to locate in or affect wetlands including alternative sites and actions;
- a statement indicating whether the proposed action conforms to applicable State or local wetlands protection standards;
- a description of the steps taken to design or modify the proposed act to minimize potential harm to or within wetlands; and
- a statement indicating how the proposed action affects the natural or beneficial values of the wetlands.

Cultural Resources

Our review of the PSA indicates that fill depths ranging from 3 to over 15 feet occur over most of both the North and South Landfill, which may preclude the presence of cultural resources which could be impacted by future remedial actions. Accordingly, we request that future documents examine whether any undisturbed soil strata exist in the project area, to assist EPA in determining whether or not a Stage IA cultural resource survey will be needed.

Endangered Species

Previous informal consultations with the US FWS has indicated that there are no federally-listed or proposed threatened or endangered species or critical habitats located within the project area. Consequently, the Endangered Species Act is not an ARAR for this site.

Other Environmental ARARs

There are no wild and scenic rivers, coastal barriers, wilderness areas, or significant agricultural lands in the vicinity of the site. In addition, the site does not lie within the Coastal Zone as designated by the state of New York. Therefore, the Wild and Scenic Rivers Act, the Coastal Barrier Resource Act, the Wilderness Act, the Farmland Protection Policy Act, and the Coastal Zone Management Act are not ARARS for this project.

Thank you for this opportunity to comment. We look forward to working with you as this project progresses, to ensure that all environmental and cultural resource concerns are adequately addressed. If you have any questions concerning these comments, please contact me at x-3759.

Attachment

cc: M. Pensak, DESA-HWSB